

**BROOKHAVEN**  
NATIONAL LABORATORY

**PETITION FOR SHUTDOWN**

**High Flux Beam Reactor  
Tritium Plume  
Pump and Recharge System**

**March 2013**

**Prepared by  
Brookhaven National Laboratory  
Operated by Brookhaven Science Associates  
Environmental Protection Division  
Groundwater Protection Group  
Upton, New York 11973**

**Under Contract with the United States Department of Energy  
Contract # DE-AC02-98CH10886**

**462903**



## **TABLE OF CONTENTS**

|   |          |
|---|----------|
| <b>1.0 INTRODUCTION.....</b>                                      | <b>1</b> |
| 1.1 Purpose .....   | 1        |
| 1.2 Regulatory History .....                                      | 1        |
| 1.3 Site Description and Plume History .....                      | 1        |
| <b>2.0 SYSTEM SHUTDOWN CRITERIA .....</b>                         | <b>2</b> |
| 2.1 System Shutdown Determination .....                           | 2        |
| 2.2 System Description.....                                       | 3        |
| 2.3 Groundwater Pump and Recharge System Operational Summary..... | 3        |
| 2.3.1 Groundwater Monitoring .....                                | 4        |
| 2.3.2 Monitoring Well Data Plume Description .....                | 4        |
| 2.3.3 System Operational Data .....                               | 5        |
| <b>3.0 CONCLUSIONS .....</b>                                      | <b>6</b> |
| <b>4.0 RECOMMENDATIONS.....</b>                                   | <b>7</b> |
| <b>5.0 REFERENCES.....</b>  | <b>8</b> |

### **FIGURES:**

- Figure 1      OU III HFBR AOC 29, HFBR Tritium Pump and Recharge System and Monitoring Locations**
- Figure 2      OU III HFBR AOC 29, Tritium Plume Concentrations 4th Quarter 2011**
- Figure 3      OU III HFBR AOC 29, Tritium Plume, Hydrogeologic Cross-Section (A-A'), 4<sup>th</sup> Quarter 2011**
- Figure 4      HFBR Downgradient Tritium Plume Segment Historical Data Trends**
- Figure 5      OU III HFBR AOC 29, Plume Comparison 1997-2011**

### **TABLES:**

- Table 1      HFBR Extraction Well Construction Data (Page 3)**

### **CHARTS:**

- Chart 1      Tritium Trends in HFBR Extraction Wells (Page 6)**

### **APPENDICES:**

- Appendix 1      Summary of Tritium Results, Permanent Monitoring Wells 2007-2012**
- Appendix 2      Summary of Tritium Results, Temporary Monitoring Wells, 2007-2012**
- Appendix 3      Proposed Sampling Frequency Changes for HFBR Downgradient Monitoring Wells**

## **1.0 INTRODUCTION**

### **1.1 Purpose**

The purpose of this formal Petition for Shutdown of the Operable Unit (OU) III High Flux Beam Reactor (HFBR) Pump and Recharge System is to document that the present conditions of the groundwater meet the objectives for shutdown and that this shutdown is consistent with the criteria established in the High Flux Beam Reactor Operations and Maintenance (O&M) Manual (BNL, February 2009 – Revision 1).

### **1.2 Regulatory History**

BNL is a federal facility owned by the United States Department of Energy (DOE) and operated by Brookhaven Science Associates (BSA). On December 21, 1989, the BNL site was included on the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) National Priorities List (NPL) under Section 120 of CERCLA. The United States Environmental Protection Agency (EPA), New York State Department of Conservation (NYSDEC), and DOE entered into a Federal Facilities Agreement, which became effective in May 1992, herein referred to as the Interagency Agreement (IAG) Administrative Docket Number: II-CERCLA-FFA-00201. The primary concern addressed in the IAG is the protection of the sole source aquifer for Suffolk County which underlies OU III. This was documented in the OU III Record of Decision (ROD) which stipulated that the cleanup of the groundwater in the Upper Glacial Aquifer at BNL meet federal drinking water standards (DWS) or Maximum Contaminant Levels (MCLs) in 30 years or less (by 2030). Contingency requirements are included in the OU III ROD for reactivation of the HFBR Pump and Recharge System.

### **1.3 Site Description and Plume History**

In late 1996, tritium was detected in monitoring wells near the HFBR. The source of the release was traced to the HFBR spent fuel pool. In response, the fuel rods were removed and the spent fuel pool was drained.

In 1997, a three-extraction well (EW-9, EW-10 and EW-11) groundwater pump and recharge system was constructed on the Princeton Avenue firebreak road, approximately 3,700 feet downgradient of the HFBR to capture the leading edge of the tritium plume and assure that the plume would not migrate off BNL property. Operations began in June 1997 and extracted water was recharged at the Remedial Action (RA) V recharge basin. **Figure 1** shows the location of the extraction wells and the RA V recharge basin.

In September 2000, the groundwater pump and recharge system was placed in standby status as per a recommendation in the June 2000 HFBR Tritium Pump and Recharge System Evaluation Report (BNL, 2000) as groundwater monitoring data in the area of the extraction wells demonstrated that the plume was attenuating to concentrations well below the federal DWS.

As described in the OU III ROD (BNL, June 2000), the selected remedy to address the HFBR tritium plume included implementing monitoring and low-flow extraction programs to prevent or minimize the plume's growth. Beginning in June 2000, and ending April 2001, 20 low-flow extraction events removed 95,000 gallons of tritiated water with concentrations greater than 750,000 picocuries/liter (pCi/L). This water was sent off site for treatment and disposal at an approved facility. The remnant of the plume's high concentration area was then monitored using permanent and temporary wells as it migrated south over time.

The OU III ROD defined contingencies that would trigger system restart are as follows:

- A detection of tritium above 25,000 pCi/L in the monitoring wells at the Chilled Water Facility, or
- A detection of tritium above 20,000 pCi/L in the monitoring wells along Weaver Drive.

The OU III ROD contingency of exceeding 20,000 pCi/L at Weaver Drive was triggered with a detection of 21,000 pCi/L in November 2006 and signified the arrival of the higher concentration plume segment in this area of the site. In 2007, a new extraction well (EW-16) was installed upgradient of the three existing extraction wells near where these higher concentrations were detected and began pumping water to the RA V recharge basin along with existing extraction well EW-11.

## **2.0 SYSTEM SHUTDOWN CRITERIA**

### **2.1 System Shutdown Determination**

The shutdown of the HFBR Tritium Pump and Recharge System is based on criteria established in the 2008 BNL Groundwater Status Report (BNL, 2008) and documented in the HFBR Pump and Recharge System O&M Manual. The criteria are stated as follows:

*"The pump and recharge well(s) will be operated until the tritium concentrations from Weaver Drive to extraction well EW-16 drop below 20,000 pCi/L. The estimated operational duration of 2 to 4 years is based on the length of the high concentration area slug and the time it would take to be completely captured by the new extraction well. The decision to turn the wells back to standby will be based on: 1) concentrations of tritium being less than 20,000 pCi/L in the monitoring wells at Weaver Drive as well as the extraction wells, and 2) verification that the new extraction well has captured concentrations of tritium in this area greater than 20,000 pCi/L. This decision to turn the wells back to standby will be supported with data from additional permanent and temporary wells, as needed."*

This Petition for Shutdown demonstrates that shutting down the pump and recharge system is consistent with the criteria established in the 2008 BNL Groundwater Status Report and the HFBR Pump and Recharge System O&M Manual.

## 2.2 System Description

The HFBR Tritium Pump and Recharge System is comprised of four extraction wells (EW-9, EW-10, EW-11 and EW-16), transfer piping, and liquid-phase Granular Activated Carbon (GAC) units. The GAC units treat the extracted water for removal of volatile organic compounds (VOCs) to below the established DWS. The extraction wells are screened in the Upper Glacial Aquifer. The locations of the extraction wells are shown on **Figure 1**. The extraction well screen depths are shown in **Table 1** below.

The entire pump and recharge system can extract groundwater at a maximum flow rate of approximately 380 gallons per minute (gpm). Actual rates vary based on operational monitoring data and system optimization. Each of the three original extraction wells, EW-9, EW-10 and EW-11 were designed to be pumped at approximately 40 gpm. Extraction well EW-16 was designed to pump at approximately 150 gpm. Maximum pumping rates for the extraction wells are shown in **Table 1** below.

The treated water is recharged to the Upper Glacial Aquifer following GAC treatment for VOCs via the RA V recharge basin located approximately 3,000 feet to the northeast as shown on **Figure 1**. This recharge basin is approximately 5,500 feet north of the BNL site boundary. Groundwater containing tritium and recharged to this basin is allowed to undergo radioactive decay and dispersion and is monitored by a series of monitoring wells located downgradient of the basin.

**Table 1 - HFBR Extraction Well Construction Data**

| HFBR Extraction Well (Site ID) | Screen Length (feet) | Screen Top (feet below land surface) | Screen Bottom (feet below land surface) | Maximum Pumping Rate (gallons per minute) |
|--------------------------------|----------------------|--------------------------------------|---|---|
| EW-9 (105-40)                  | 20                   | 130                                  | 150                                     | 60  |
| EW-10 (105-39)                 | 20                   | 130                                  | 150                                     | 60  |
| EW-11 (105-41)                 | 20                   | 130                                  | 150                                     | 60  |
| EW-16 (096-119)                | 40                   | 80                                   | 120                                     | 200                                       |

## 2.3 Groundwater Pump and Recharge System Operational Summary

In May 1997, the HFBR Groundwater Pump and Recharge System began operation with the purpose of preventing additional downgradient migration of the tritium plume. The system was placed on standby status in September 2000.

A detection of 21,000 pCi/L of tritium was identified at Weaver Drive in November 2006. The OU III ROD contingency plan called for the restart of the Princeton Avenue extraction wells;

however, the leading edge of the high concentration area was not anticipated to arrive at the Princeton Avenue firebreak road until 2008, and the path of the HFBR tritium plume had shifted several hundred feet to the east since the system was installed. To address this, a fourth extraction well (EW-16) was installed at a location approximately 400 feet north of the existing extraction wells (**Figure 1**). Groundwater modeling performed in 2007 was used to optimize the location of extraction well EW-16 so that it would capture the leading edge of the high concentration downgradient tritium plume segment. Extraction wells EW-16 and EW-11 (Princeton Avenue) were restarted in late 2007. Extraction well EW-11 is the easternmost of the extraction wells on Princeton Avenue and was placed in operation to capture tritium that may have passed east of the EW-16 capture zone. Extraction wells EW-9 and EW-10 remained in standby.

Data collected from the monitoring well network have shown that extraction well EW-16 has effectively captured the high concentration tritium plume.

### **2.3.1 Groundwater Monitoring**

Monitoring of the downgradient tritium plume segment and the effectiveness of the pump and recharge system was accomplished using a combination of 20 permanent monitoring wells and 69 temporary monitoring wells (installed using Geoprobe<sup>TM</sup> equipment). The temporary wells were generally installed along several transects with some locations repeated in successive sampling rounds. A breakdown of the number of temporary wells installed by year to supplement the permanent monitoring well network is as follows:

- 2008: 19 temporary wells
- 2009: 13 temporary wells
- 2010: 24 temporary wells
- 2011: 13 temporary wells

The permanent monitoring wells were sampled at a quarterly frequency since 2007. Details on groundwater monitoring can be found in the annual BNL Groundwater Status Reports. These monitoring wells are located from the Chilled Water Facility (north) to Princeton Avenue (south) as shown in **Figure 1**. This downgradient tritium plume segment has been tracked over the past twelve years as it migrated south from the HFBR facility. An additional seven permanent wells monitor tritium concentrations in groundwater downgradient of the RA V recharge basin.

### **2.3.2 Monitoring Well Data Plume Description**

A continuous plume containing tritium concentrations above the DWS of 20,000 pCi/L extended from the HFBR, south to the vicinity of the Chilled Water Facility transect during the late 1990s. The segment of the plume containing the highest tritium concentrations (in the vicinity of Temple Place) was remediated via low-flow pumping and off-site disposal (95,000 gallons of tritiated water above 750,000 pCi/L) in 2000 and 2001. The remnants of this high concentration segment of the plume migrated to the vicinity of Weaver Drive in 2006 and triggered the OU III ROD contingency requiring BNL to re-start the pump and recharge system. This plume segment was monitored intensively from 2007 through 2011 as it migrated to the capture zone of

extraction well EW-16. A summary of tritium sampling results from the permanent monitoring wells is provided as **Appendix 1**. Tritium sampling results from temporary monitoring wells are provided as **Appendix 2**.

Comprehensive annual summaries of monitoring well data for this plume since the pump and recharge system was re-started in 2007 can be found in the annual BNL Groundwater Status Reports (BNL, 2007-2011). The last detection of tritium in this area above the DWS was 56,600 pCi/L in temporary well GP-340 during October 2009. All data from permanent and temporary wells indicate that the downgradient tritium plume segment attenuated to less than the DWS in 2010 and 2011.

**Figure 2** and **Figure 3** show tritium monitoring data for the fourth quarter of 2011 in plan and cross sectional views. These figures show that all tritium concentrations from Weaver Drive to Princeton Avenue are below the DWS for the fourth quarter of 2011.

**Figure 4** demonstrates historical tritium trends for several key permanent and temporary wells upgradient of the pump and recharge system extraction wells.

**Figure 5** shows a time-series comparison of the plume for select years from 1997 through 2011 to demonstrate the attenuation of the HFBR tritium plume.

The seven monitoring wells located downgradient of the RA V recharge basin (see **Figure 1**) are sampled to monitor tritium concentrations in groundwater impacted by the discharge of water from the HFBR Pump and Recharge System. Tritium data for these wells are summarized in **Appendix 1**. The highest tritium concentration observed since 2007 in these wells was 1,640 pCi/L in well 076-173 during 2010. Tritium results during the remainder of 2007-2011 for these wells were below 1,000 pCi/L. Based on these data, the impact of recharging water containing low concentrations of tritium to the RA V recharge basin has been minimal.

Tritium continues to be detected at concentrations above the DWS periodically in monitoring wells located immediately downgradient of the HFBR. These detections are in response to the flushing of residual tritium (remaining in the unsaturated zone beneath the HFBR building) into the aquifer when the water table rises. The source area will continue to be monitored and discussed in the annual BNL Groundwater Status Reports.

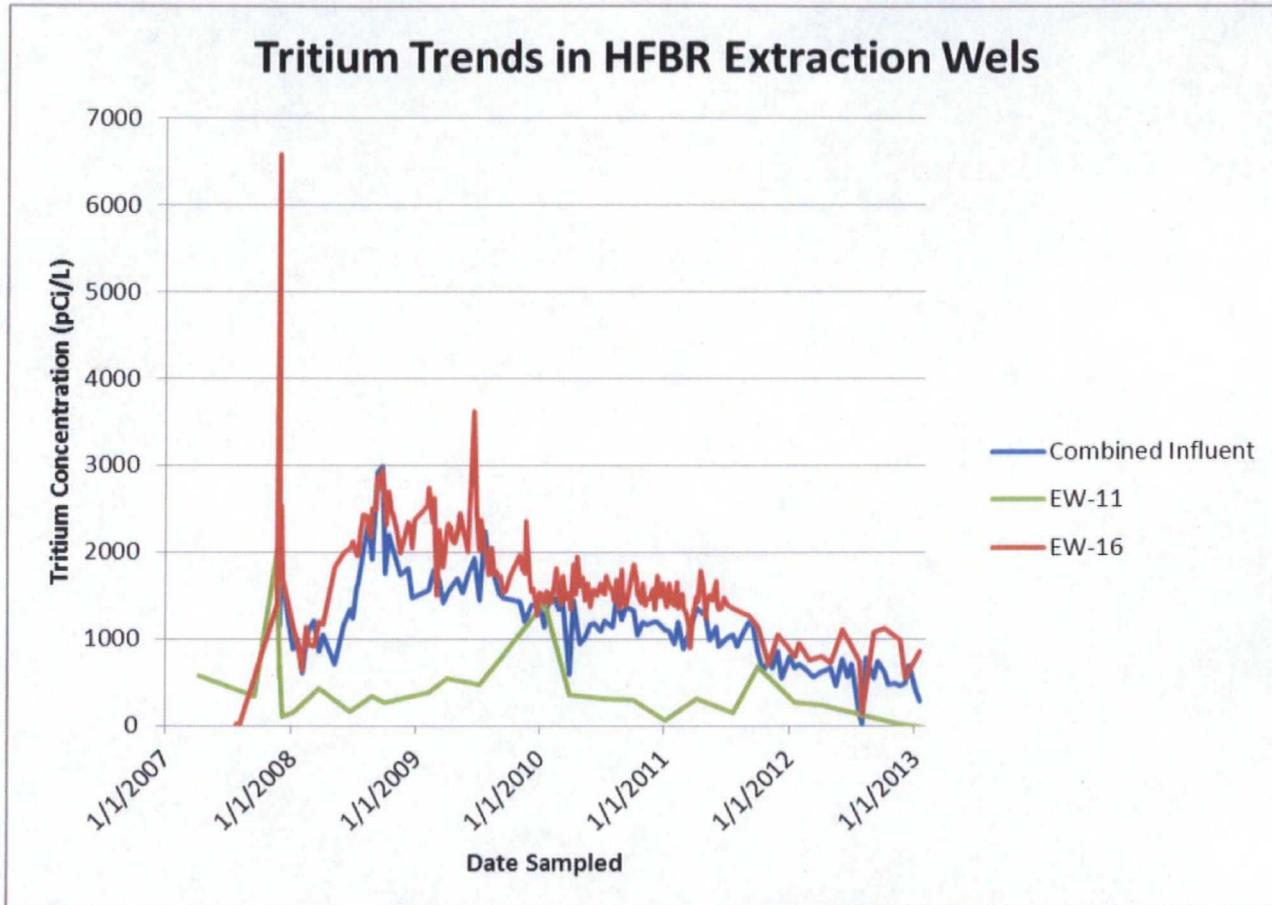
A recommendation was submitted in the 2011 BNL Groundwater Status Report (BNL, 2011) to petition for shutdown of the HFBR Pump and Recharge System and scale back groundwater monitoring of the downgradient tritium plume segment.

### 2.3.3 System Operational Data

The combined influent from EW-11 and EW-16 has displayed a decreasing tritium concentration since 2009 (see **Chart 1** below). The peak influent combined tritium concentration since the HFBR Pump and Recharge System was restarted in 2007 was 2,990 pCi/L in 2008. Current combined influent concentrations are less than 500 pCi/L.

Tritium in the system influent is almost exclusively derived from extraction well EW-16 where a peak tritium concentration of 6,580 pCi/L was observed shortly after system restarted in 2007. Extraction well EW-16 concentrations quickly declined following the system restart to below 3,000 pCi/L and then steadily decreased to the present concentrations of less than 1,000 pCi/L. Tritium has been near or below the method detection limit in extraction well EW-11 since the system restarted in 2007.

Chart 1



### 3.0 CONCLUSIONS

The following conclusions can be drawn regarding the HFBR Pump and Recharge System and downgradient plume segment:

- Tritium concentrations in permanent and temporary monitoring wells in the vicinity of the pump and recharge system have remained below the DWS since 2009.
- Tritium concentrations in extraction wells EW-16 and EW-11 have remained well below the DWS since the system was restarted in 2007 and are presently less than 1,000 pCi/L.
- Tritium concentrations in monitoring wells downgradient of the RA V recharge basin have been less than 1,000 pCi/L, with one exception in 2010 (1,640 pCi/L).

- Extraction well EW-16 was effective in capturing the downgradient, higher concentration portions of the tritium plume.
- Only trace amounts of tritium have been detected since the system restarted in 2007 in extraction well EW-11.
- This system has met all of the criteria established in the HFBR Pump and Recharge System O&M Manual for system shutdown.

## 4.0 RECOMMENDATIONS

Based on the conclusions above, it is recommended that the HFBR Tritium Pump and Recharge System be shut down in the spring of 2013. The system will remain in standby mode (operationally ready) for several years and the extraction wells will be sampled on a quarterly basis. Twenty-one permanent monitoring wells will be utilized to monitor the area between the Chilled Water Facility and Princeton Avenue. The recommended sampling frequencies for these wells are outlined in **Appendix 3**. In addition, temporary monitoring well locations GP-297, GP-298, GP-359, GP-340, and GP-341 will be sampled annually. The monitoring program is designed to detect any rebound or reoccurrence of elevated tritium concentrations in this area and will be re-evaluated in the Annual Groundwater Status Reports. If tritium is detected above the DWS in these wells as part of this monitoring program, a restart of the pump and recharge system will be assessed.

Monitoring of the remainder of the HFBR tritium plume will continue and will be re-evaluated as part of the upcoming 2012 BNL Groundwater Status Report.

## **5.0 REFERENCES**

---

BNL, Operable Unit III Record Of Decision, June 2000

BNL, Site Environmental Report, Volume II, 2007 Annual Groundwater Status Report, June 2008

BNL, Site Environmental Report, Volume II, 2008 Annual Groundwater Status Report, June 2009

BNL, Site Environmental Report, Volume II, 2009 Annual Groundwater Status Report, June 2010

BNL, Site Environmental Report, Volume II, 2010 Annual Groundwater Status Report, June 2011

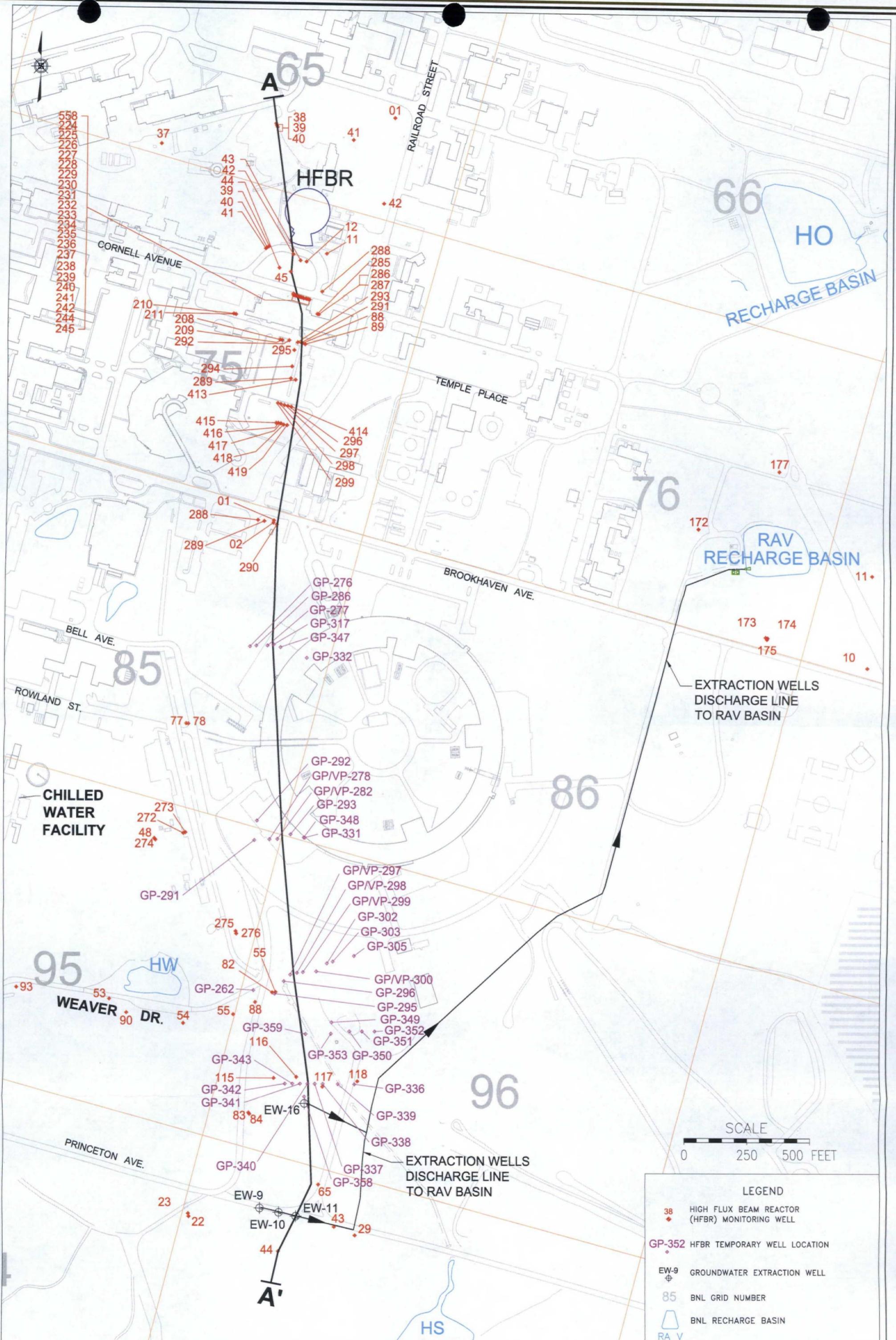
BNL, Site Environmental Report, Volume II, 2011 Annual Groundwater Status Report, September 2012

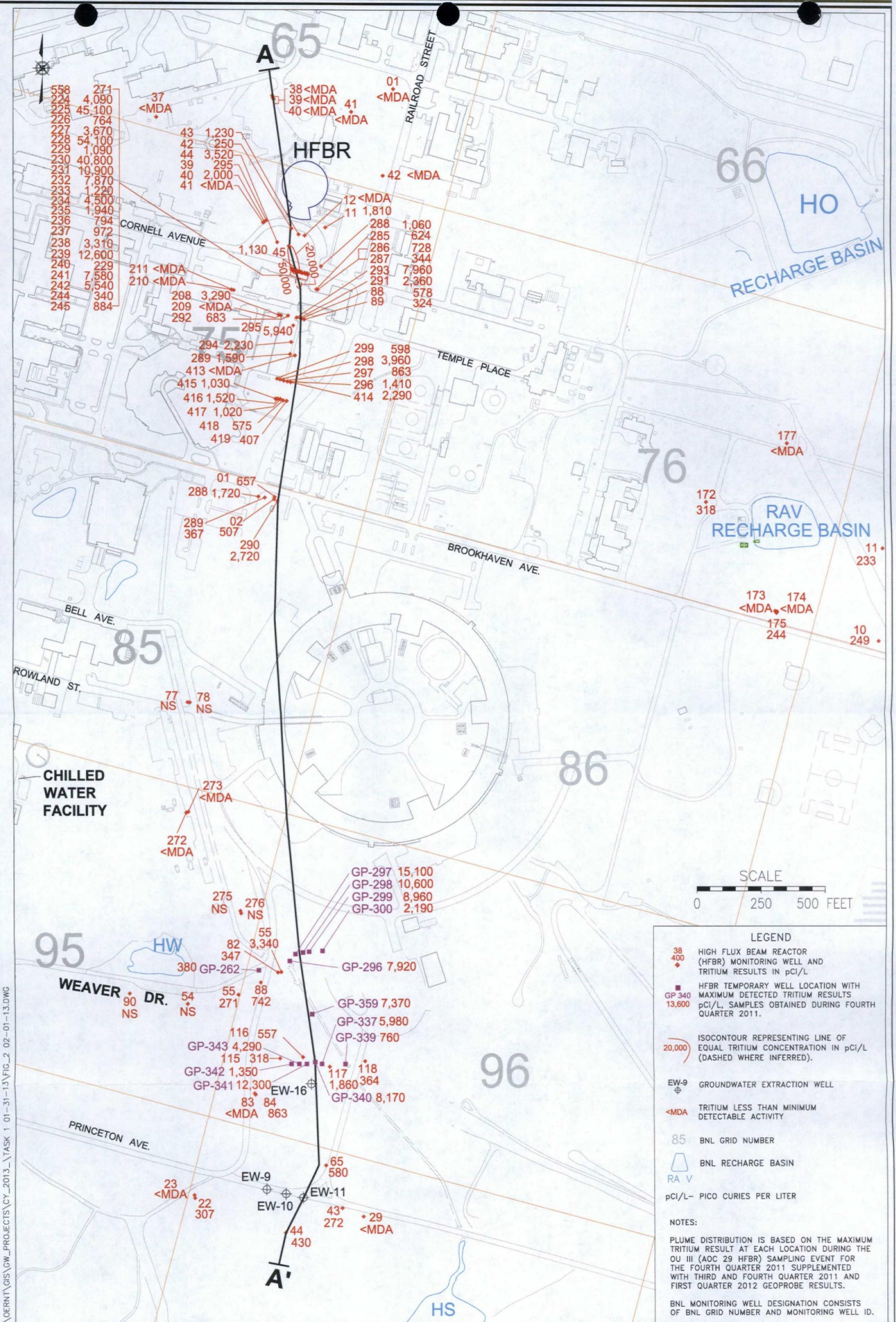
BNL, High Flux Beam Reactor Operations and Maintenance Manual, February 2009, Revision 1

BNL, HFBR Tritium Pump and Recharge System Evaluation Report June, 2000

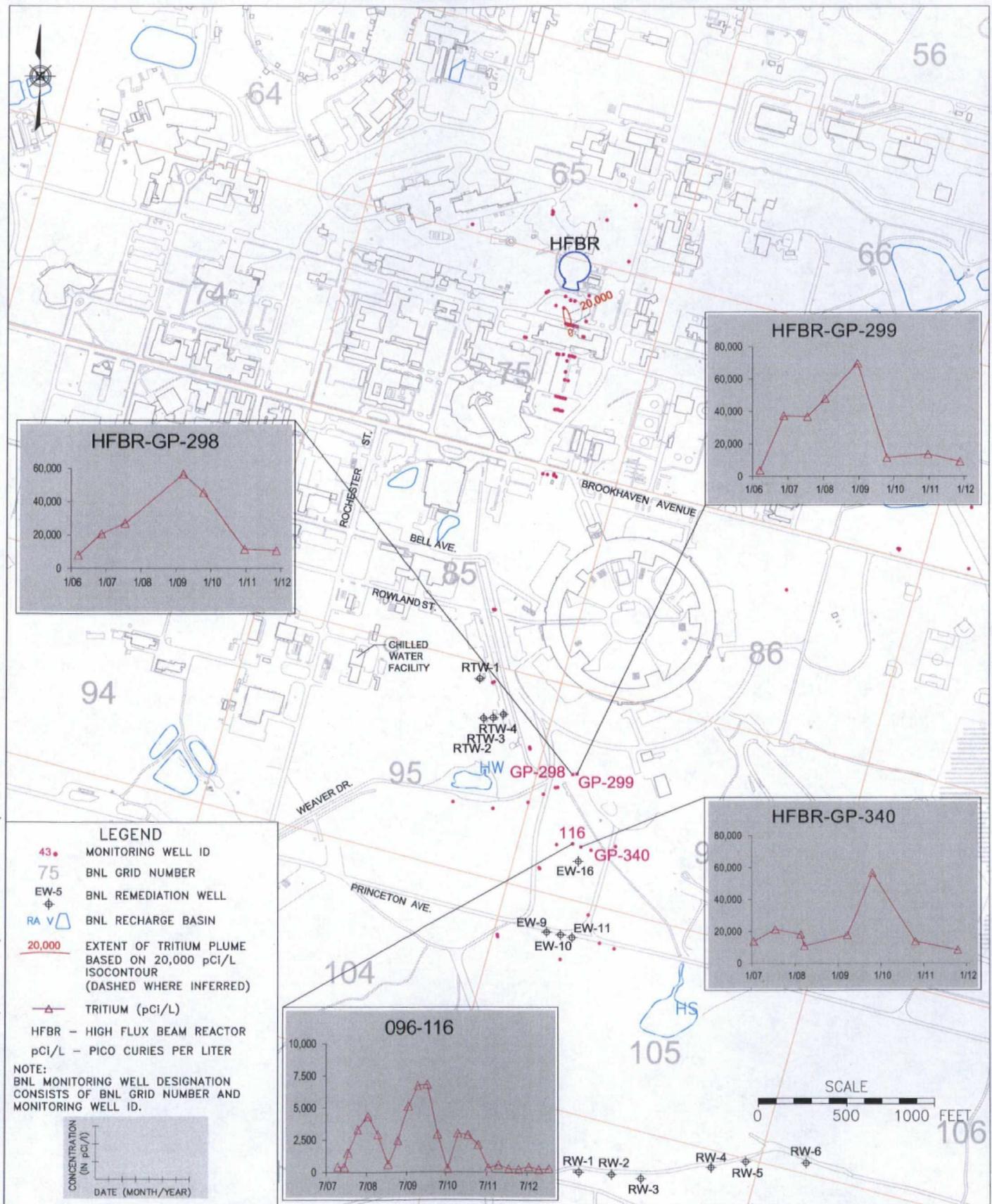
**Figures**

ΔAV<sub>EW</sub>











**BROOKHAVEN**  
NATIONAL LABORATORY

ENVIRONMENTAL PROTECTION DIVISION

TITLE:

OU III HFBR AOC 29  
PLUME COMPARISON 1997 – 2011

HFBR PETITION FOR SHUTDOWN

|                  |               |                   |                   |
|------------------|---------------|-------------------|-------------------|
| DWN:<br>AJZ      | VT: HZ.:<br>– | DATE:<br>02/26/13 | PROJECT NO.:<br>– |
| CHKD:<br>JEB     | APPD:<br>WRD  | REV.:<br>–        | NOTES:<br>–       |
| FIGURE NO.:<br>5 |               |                   |                   |

**Appendix 1**

△ AVERY

















**Appendix 1**  
**Summary of Tritium Results**  
**Permanent Monitoring Wells**  
**2007 - 2012**

| <b>Site ID</b> | <b>Sample Date</b> | <b>Analyte</b> | <b>Value</b> | <b>Detection Limit</b> | <b>Error</b> | <b>Units</b> | <b>Depth (ft below land surface)</b> | <b>Qualifier</b> |
|----------------|--------------------|----------------|--------------|------------------------|--------------|--------------|--------------------------------------|------------------|
| 077-10         | 4/1/2008           | Tritium        | 350          | 350                    | 220          | pCi/L        | 104                                  | J                |
| 077-10         | 10/1/2008          | Tritium        | 330          | 310                    | 200          | pCi/L        | 99                                   | J                |
| 077-10         | 4/7/2009           | Tritium        | 125          | 275                    | 164          | pCi/L        | 104                                  | U                |
| 077-10         | 10/8/2009          | Tritium        | 397          | 256                    | 165          | pCi/L        | 104                                  |                  |
| 077-10         | 4/2/2010           | Tritium        | 1520         | 239                    | 231          | pCi/L        | 104                                  |                  |
| 077-10         | 10/7/2010          | Tritium        | 300          | 200                    | 150          | pCi/L        | 104                                  |                  |
| 077-10         | 4/1/2011           | Tritium        | 258          | 237                    | 147          | pCi/L        | 104                                  |                  |
| 077-10         | 10/7/2011          | Tritium        | 249          | 227                    | 141          | pCi/L        | 104                                  | UJ(+)-B          |
| 077-10         | 4/5/2012           | Tritium        | 373          | 218                    | 141          | pCi/L        | 104                                  | UJ(+)-B          |
| 077-10         | 10/4/2012          | Tritium        | 538          | 285                    | 184          | pCi/L        | 104                                  |                  |
| 077-11         | 4/1/2008           | Tritium        | 410          | 350                    | 230          | pCi/L        | 120                                  | J                |
| 077-11         | 10/2/2008          | Tritium        | 300          | 310                    | 200          | pCi/L        | 120                                  | U                |
| 077-11         | 4/7/2009           | Tritium        | 204          | 274                    | 167          | pCi/L        | 120                                  | U                |
| 077-11         | 10/8/2009          | Tritium        | 473          | 256                    | 169          | pCi/L        | 120                                  |                  |
| 077-11         | 4/2/2010           | Tritium        | 388          | 237                    | 152          | pCi/L        | 120                                  |                  |
| 077-11         | 10/7/2010          | Tritium        | 220          | 200                    | 140          | pCi/L        | 120                                  |                  |
| 077-11         | 4/1/2011           | Tritium        | 254          | 238                    | 147          | pCi/L        | 120                                  |                  |
| 077-11         | 10/7/2011          | Tritium        | 233          | 226                    | 139          | pCi/L        | 120                                  | UJ(+)-B          |
| 077-11         | 4/5/2012           | Tritium        | 447          | 216                    | 144          | pCi/L        | 120                                  | UJ(+)-B          |
| 077-11         | 10/4/2012          | Tritium        | 545          | 284                    | 184          | pCi/L        | 120                                  |                  |

U - Not detected.

J - Estimated value.

UJ(+)-B - Not detected, raised estimated detection limit due to blank contamination.

**Appendix 2**















**Appendix 3**

△ AVE\_RV

